

SULLIVAN & CROMWELL LLP

TELEPHONE: 1-212-558-4000
FACSIMILE: 1-212-558-3588
WWW.SULLCROM.COM

125 Broad Street
New York, New York 10004-2498

LOS ANGELES • PALO ALTO • WASHINGTON, D.C.

BRUSSELS • FRANKFURT • LONDON • PARIS

BEIJING • HONG KONG • TOKYO

MELBOURNE • SYDNEY

March 19, 2025

Via ECF

Chief Judge Virginia M. Kendall
United States District Court for the Northern District of Illinois
Everett McKinley Dirksen United States Courthouse, Courtroom 2541
219 South Dearborn Street
Chicago, IL 60604

Re: Illinois Bankers Association v. Raoul, Case No. 1:24-cv-07307

Dear Chief Judge Kendall:

I write on behalf of the Bank Policy Institute, The Clearing House Association L.L.C., and the Consumer Bankers Association (together, “*Amici*”), who, on August 28, 2024, submitted a motion for leave to file an *amici curiae* brief in the above-captioned matter in support of Plaintiffs’ motion for a preliminary injunction. (See Dkt. No. 35.) On October 3, 2024, this Court granted *Amici* leave to file the brief. (See Dkt. No. 63.) As the brief explained, the Illinois Interchange Fee Prohibition Act is preempted by federal law and threatens to disturb the proper functioning of payment systems not only in Illinois but also across the country by setting a precedent encouraging other states—or even localities—to enact their own laws disrupting card payment systems.

Amici respectfully request that their previous submission be considered by the Court in conjunction with Plaintiffs’ pending motion for summary judgment (see Dkt. No. 123), as the arguments set forth in *Amici*’s previous submission are equally applicable at the summary judgment stage. Accordingly, *Amici* stand by their prior *amici curiae* brief and respectfully urge the Court to grant Plaintiffs’ motion for summary judgment.

Respectfully submitted,

/s/ Matthew A. Schwartz
Matthew A. Schwartz

*Counsel for Amici Curiae Bank Policy
Institute, The Clearing House Association
L.L.C., and Consumer Bankers Association*

cc: All counsel of record